

EXHIBIT B

From: Andrea P Roberts <andreaproberts@quinnemanuel.com>
Sent: Saturday, July 01, 2017 11:33 PM
To: John Cooper (JCooper@fbm.com); Matthew Cate (MCate@fbm.com);
UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; DG-
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Cc: QE-Waymo
Subject: Waymo v. Uber - Meet and Confer re ESI

Follow Up Flag: Follow up
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John and Counsel,

Following up on today's call, Waymo agrees to disclose to Uber by noon on Monday the custodial and non-custodial sources searched in response to Defendants' document requests, and the date ranges and search terms used. This disclosure will relate to the searches in response to Uber's 1st and 2nd Sets of RFPs. This agreement is based on the representation by Uber that it will do the same at the same time. If we are not in agreement on this point, please promptly let us know.

Further, we hope that this mutual exchange will narrow the issues in dispute going forward and not be used to create more disputes. As I explained on the call, we would have preferred to have these discussions a month ago when we first proposed an ESI Order. Uber's month-long delay in even responding undermines its claim of urgency in obtaining this information. We nevertheless will mutually exchange the information above in an effort to move the ball forward

I joined the call late today and so am not certain if Otto Trucking was intended to be included in this mutual exchange. If Otto Trucking will exchange the same information, please let us know.

Thanks,

Andrea

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